

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

vs.

C.A. No. 1:19-cv-02521-SAG

PERDUE FARMS, INC. et al.,

Defendants.

**JOINT STIPULATION REGARDING SCHEDULING ORDER
& ESI PROTOCOL DOCUMENT**

WHEREAS, on April 23, 2021, Plaintiffs and Defendants (collectively, the “Parties”) in the above-captioned matter submitted a Joint Letter (ECF No. 449) regarding the status of their negotiations and remaining areas of dispute on a Proposed First Scheduling Order (“Scheduling Order”) and a Proposed Order Regarding Production of Electronically Stored Information and Paper Documents (“ESI Protocol Document”);

WHEREAS, on April 29, 20201, the Court issued a Letter to Counsel (ECF No. 451) in response to the Parties’ Joint Letter;

WHEREAS, in that Letter the Court resolved the Parties’ remaining disputes regarding the Scheduling Order and the ESI Protocol Document and instructed the parties to “incorporate the details of this Order into an updated proposed Scheduling Order and ESI Protocol Document and [] submit those updated documents jointly for the Court’s review and approval,” ECF No. 451 at 2;

THEREFORE, the Parties submit for this Court's review and approval an updated Scheduling Order (Exhibit A) and an updated ESI Protocol Document (Exhibit B), revised according to this Court's instructions.

Respectfully submitted,

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